

COHN LIFLAND PEARLMAN HERRMANN & KNOFF LLP

COUNSELLORS AT LAW

PARK 80 WEST - PLAZA ONE 250 PEHLE AVE. SUITE 401 SADDLE BROOK N.J. 07663 201-845-9600 FAX 201-845-9423

General E-mail: clphk@njlawfirm.com

Internet Address: www.njlawfirm.com

PETER S. PEARLMAN, ESQ. Email: psp@njlawfirm.com

Direct Dial: 551-497-7131 / Cell Phone: 201-709-0597

May 1, 2019

VIA ECF

Honorable Lois H. Goodman, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Federal Bldg. & U.S. Courthouse
402 East State Street, Room 7050
Trenton, New Jersey 08608

Re: *In Re Effexor XR Antitrust Litigation*
Civil Action No.: 3:11-cv-5479 (PGS/LHG) (Lead)

Dear Judge Goodman:

I write to follow up on our letter to Your Honor of April 30, 2019 (ECF No. 586) concerning Plaintiffs' Motion to Compel Zydus Pharmaceuticals U.S.A. and Cadila Healthcare Limited (together, "Zydus") to Produce Documents (ECF No. 581) in the above-referenced action.

Since serving that letter Plaintiffs have conferred with Zydus's counsel by phone, and have another telephone conference with Zydus scheduled for tomorrow. We hope to be able to reach agreement on some or all of the documents requested in Plaintiffs' motion within the next week. Accordingly, at Zydus's request, we write to ask that Your Honor briefly defer any ruling on this motion until May 13.

For avoidance of doubt, Plaintiffs reserve all rights, including the right to argue that this motion is uncontested due to Zydus's failure to timely oppose it.

Respectfully yours,

/s/ Peter S. Pearlman

Peter S. Pearlman

PSP:mds

cc: James Nealon, Esq. (*Via E-Mail James.Nealon@withersworldwide.com*)
All Counsel of Record (*Via ECF*)